IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Baltimore Life Insurance Company	0	
	0	
PLAINTIFF	0	
	0	
v	0	CASE NO.: 1:16-cv-02773-MJG
	0	
Deborah Purnell, et al.	0	
	0	
DEFENDANT(S)	0	

REQUEST FOR REASONABLE ATTORNEY'S FEES

NOW COMES Henry Bond, Jr., hereinafter referred to as Defendant "Bond," by and through his attorney, Russell A. Neverdon, Sr. and the Law Office of Russell A. Neverdon, Sr., LLC, and hereby requests that this Honorable Court grant him an extension to file a claim against the policy that is the subject of the above-captioned matter, and in support thereof, states as follows:

- That Defendant "Bond" recently retained Russell A. Neverdon, Sr. and the Law Office of Russell A. Neverdon, Sr., LLC to represent his interests in the abovecaptioned matter.
- That Defendant "Bond," subsequent paying an initial Retainer, agreed to enter into a contingency contract with counsel.

WHEREFORE, Defendant "Bond" respectfully prays:

- A. That this Honorable Court Grant this Request for Reasonable Attorney's Fees;
- B. That this Honorable Court award Russell A. Neverdon, Sr., and the Law Office of Russell A. Neverdon, Sr., LLC any and all reasonable attorney's fees that the nature of this action may require.

C. That Defendant "Bond" be awarded any such other and further remedies that the nature of this action may require.

<u>/S/</u> Russell A. Neverdon, Sr., Esquire

Federal ID No.: 25949

Law Office of Russell A. Neverdon, Sr., LLC

711 Saint Paul Street, Ground Floor

Baltimore, Maryland 21202

Office: (410) 235-2184 Facsimile: (410) 235-4000

Neverdon@me.com

ATTORNEY FOR DEFENDANT HENRY BOND, JR.

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Baltimore Life Insurance Company	0	
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PLAINTIFF	0	
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DEFENDANT(S)	0	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 28th day of April, 2017, a copy of the foregoing

Request for Reasonable Attorney's Fees was electronically filed and forwarded to the following:

Charles F. Gormly, Esq. Law Office of Charles F. Gormly 5101 Wisconsin Ave., NW, Ste. 210 Washington, DC 20016 cfgormly@earthlink.net

Marc Andrew Campsen, Esq. Wright, Constable & Skeen, LLP 100 N. Charles St., 16th Floor Baltimore, Maryland 21201 mcampsen@wcslaw.com Carrie O'Brien, Esq. Franklin & Prokopik, P.C. 2 N. Charles Street, Ste. 600 Baltimore, Maryland 21201 cobrien@fandpnet.com

<u>/S/</u>

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ATTORNEY FOR DEFENDANT HENRY BOND, JR.